

MEMORANDUM ENDORSED

April 6, 2020

Via ECF

Hon. Gregory H. Woods, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Letter Motion to Compel Defendants to Respond to Plaintiff's First Set of Interrogatories and First Demand for Document Production

1: 18-cv-08259-GHW Zhang v. Four Seasons Beauty Spa, Inc. et al

Your Honor:

This office represents the Plaintiffs in the above-referenced matter. We write to respectfully request that Defendants be compelled to respond to Plaintiff's first set of interrogatories and first demand for document production which was served since February 3, 2020.

The Court has set April 23, 2020 as a deadline for fact discovery. On February 3, 2020, Defendants were served the Plaintiff's first set of interrogatories and first demand for document production. However, Plaintiff did not receive the responses by March 4, 2020, and has not received any until today. On March 12, 2020, Defendants were served No Objection letter. On March 19, 2020, Defendants sought for a two-month extension of time to respond to the Plaintiff's discovery request. On March 30, 2020, almost two months after the service of Plaintiff's discovery requests, Plaintiff asked to respond no later than April 3, 2020 because there had already been a considerable length of time for Defendants to produce the responses and it was very unlikely that Defendants would need additional two months to produce readily available information and records.

On the other hand, on March 5, 2020, a day after the deadline for Defendants to respond to Plaintiff's discovery request, Plaintiff was served Defendants' first set of interrogatories and first demand for document production. Despite the pandemic, Plaintiff has promptly served the Defendants the Plaintiff's responses to the Defendants' discovery requests today (March 6, 2020).

For the foregoing reasons, Plaintiff respectfully requests that Defendants be compelled to produce the outstanding responses and document production to the Plaintiff's first set of interrogatories and first demand for document production.

We thank the Court for its time and consideration in this matter.

Respectfully Submitted,

TROY LAW PLLC

/s/ John Troy

John Troy


JT/II

Cc: all counsel of record *VIA* ECF

Application denied without prejudice. Counsel may renew his request in accordance with the procedures to request a pre-motion conference concerning discovery as set forth in the Court's Individual Rules of Practice in Civil Cases 2.C.ii.

SO ORDERED.

Dated: April 6, 2020



GREGORY H. WOODS
United States District Judge